

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE NEW FORTRESS ENERGY INC. : 24-cv-07032 (JGK)
SECURITIES LITIGATION :
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STIPULATION AND [PROPOSED] SCHEDULING ORDER

WHEREAS, on December 17, 2024, the Court issued an order that (i) consolidated for all purposes the two actions *Bojdol v. New Fortress Energy Inc., et al.*, 24-cv-07032, and *Anderson v. New Fortress Energy Inc., et al.*, 24-cv-08356, (ii) appointed Jack DeCicco (“Lead Plaintiff”) as lead plaintiff and (iii) approved Lead Plaintiff’s selection of counsel (ECF No. 30);

WHEREAS, Lead Plaintiff intends to file an Amended Complaint, which Defendants New Fortress Energy, Inc., Wesley Robert Edens, Christopher S. Guinta, and Andrew Dete (collectively, “Defendants”) anticipate moving to dismiss;

WHEREAS, Lead Plaintiff and Defendants have conferred and agreed on a proposed briefing schedule; and

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, subject to the Court’s approval, as follows:

1. Lead Plaintiff shall file its amended complaint on or before **February 18, 2025**.
2. Defendants shall file their motions to dismiss on or before **April 4, 2025**.
3. Lead Plaintiff shall file any opposition to the motions to dismiss, or another amended complaint, on or before **May 19, 2025**.

4. If Lead Plaintiff files an opposition, Defendants shall file any reply papers in further support of their motions to dismiss on or before **June 6, 2025**.
5. Should Lead Plaintiff file a second amended complaint on May 19, 2025 instead of an opposition to the motions to dismiss, Defendants shall file motions to dismiss the second amended complaint on or before **July 2, 2025**. Lead Plaintiff shall file any opposition to the motions to dismiss the second amended complaint on or before **August 18, 2025**. Defendants shall file their reply in further support of the motions to dismiss the second amended complaint on or before **September 8, 2025**.

Dated: New York, New York
December 20, 2024

/s/ Adam M. Apton

Adam M. Apton
LEVI & KORSINSKY, LLP
33 Whitehall Street, 17th Floor
New York, New York 10004
Telephone: (212) 363-7500
Facsimile: (212) 363-7171
aapton@zlk.com

Counsel for Lead Plaintiff

/s/ Scott D. Musoff

Scott D. Musoff
**SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP**
One Manhattan West
New York, New York 10001
Telephone: (212) 735-3000
Facsimile: (212) 735-2000
scott.musoff@skadden.com

Joseph O. Larkin (*pro hac vice*)
**SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP**
One Rodney Square
920 N. King Street
Wilmington, Delaware 19801
Phone: (302) 651-3000
Facsimile: (302) 651-3001
joseph.larkin@skadden.com

*Counsel for Defendants New Fortress
Energy Inc., Wesley Robert Edens,
Christopher S. Guinta, and Andrew Dete*

IT IS SO ORDERED.

Dated: _____, 2024

HONORABLE JOHN G. KOELTL
UNITED STATES DISTRICT JUDGE